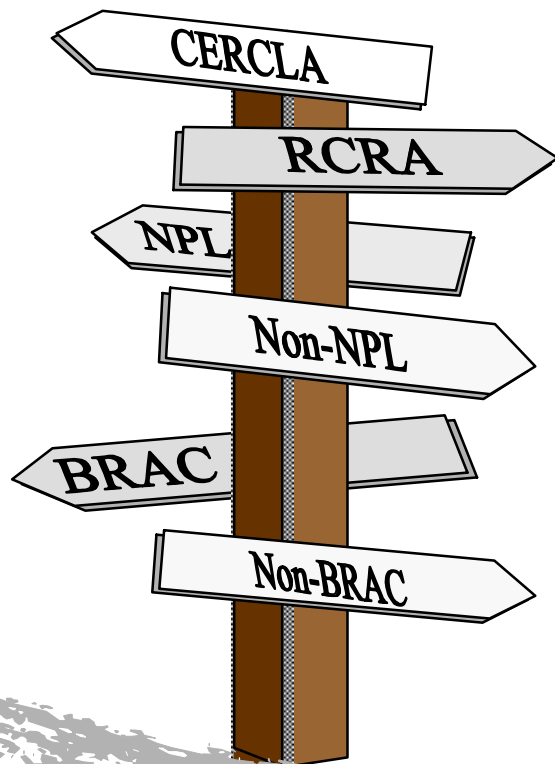


The Road to Site Closeout



“Finishing the Job”

Jim Daniel
Army Environmental Center
(410) 671-1501
jdaniel@aec2.apgea.army.mil

Mary Sanderson
EPA Region 1
(617) 573-5711
sanderson.mary@epamail.epa.gov



BRAC Cleanup Team Workshops - Site Closeout

***“We are at the beginning of the
end of our cleanup program.”***

—Sherri W. Goodman

**Deputy Under Secretary of Defense
(Environmental Security)**



BRAC Cleanup Team Workshops - Site Closeout

Program Focus is Changing

- **To Date: Last Remedy in Place (LRIP)/
Construction Completion(CC)**
- **Today: Identifying requirements
beyond LRIP/CC**
- **Tomorrow: Complete cleanup and
close out sites**



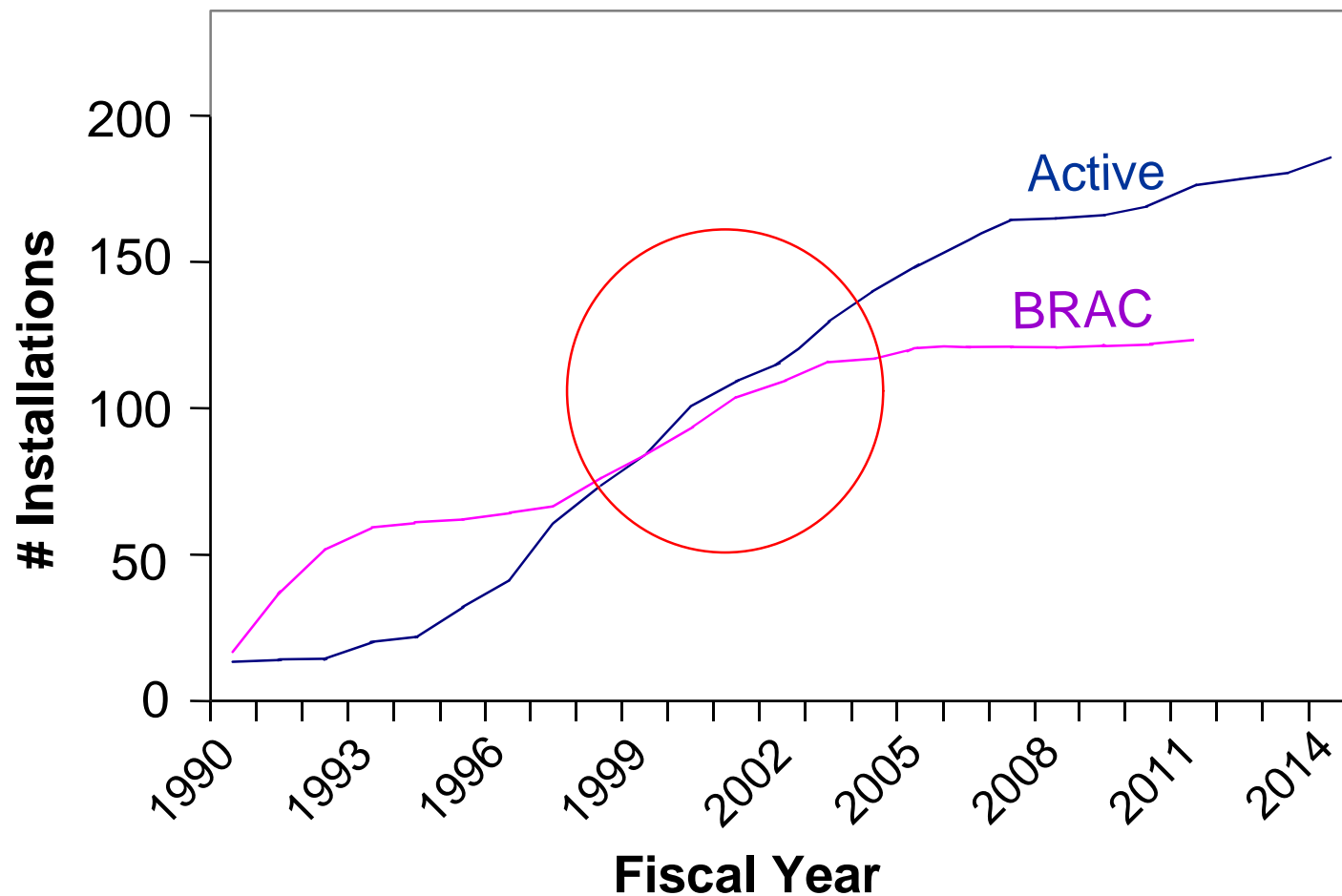
Issues and Challenges Beyond LRIP/CC

- **Conventional Wisdom: Everyone is happy after LRIP/CC is achieved!**
- **Reality: Requirements to reach site closeout extend beyond LRIP/CC and raise new types of issues and challenges! However,**

“One size doesn’t fit all”



Cumulative RIP/RC Army Installations



BRAC Cleanup Team Workshops - Site Closeout

Site Closeout Considerations

- **CERCLA and RCRA Corrective Action sites**
- **NPL and Non-NPL facilities**
- **BRAC and Non-BRAC installations**
- **Federal and State regulatory requirements**
- **Community involvement**



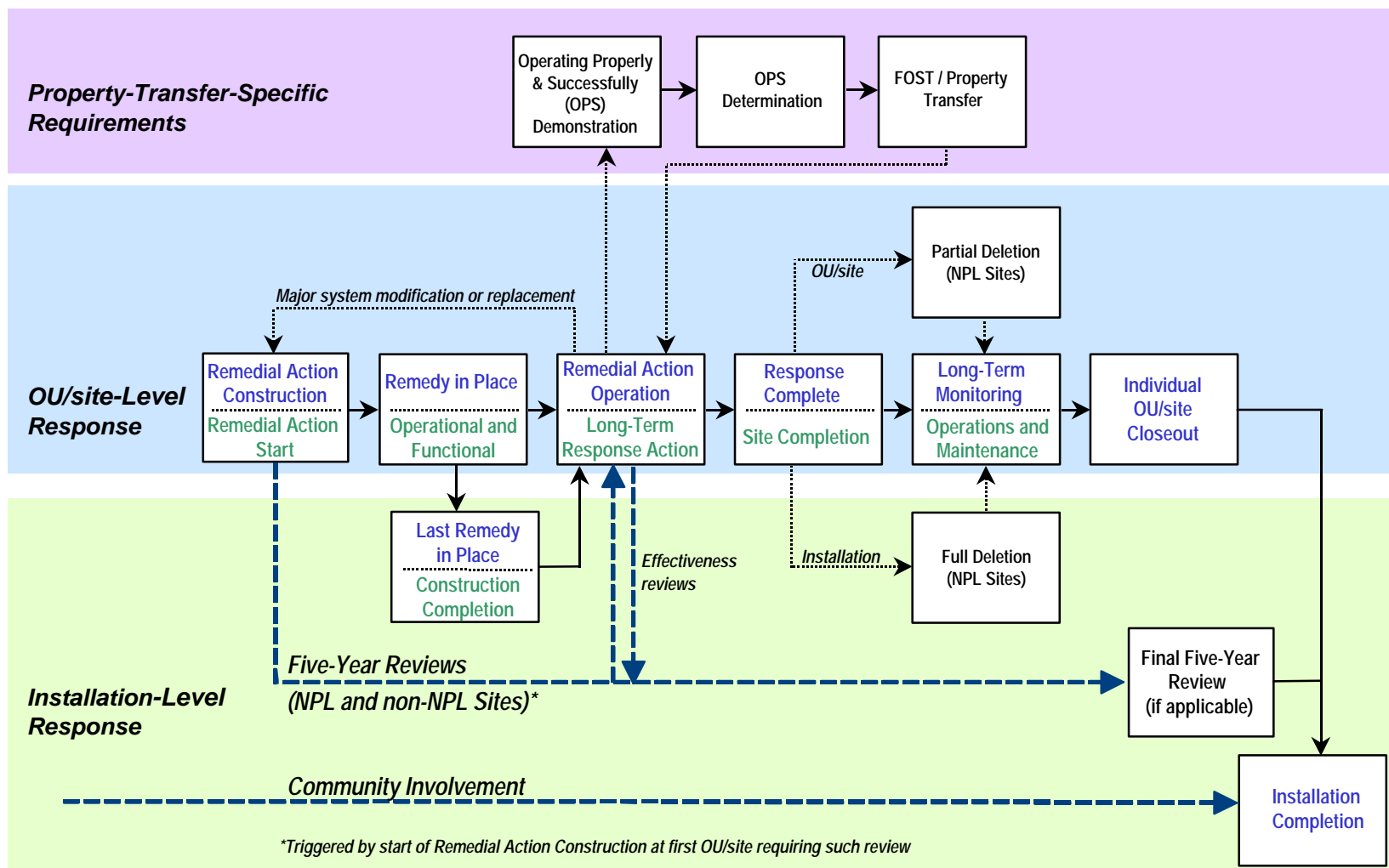
Comparison of Milestones/Terminology*

DoD Milestones	CERCLA Milestones	RCRA Milestones	
Site Discovery	Site Discovery	RCRA Facility Assessment	
Preliminary Assessment/ Site Investigation	Preliminary Assessment/ Site Investigation		
Remedial Investigation	Remedial Investigation		
Feasibility Study	Feasibility Study	RCRA Facility Investigation	
Record of Decision	Record of Decision	Corrective Measures Study	
Remedial Design	Remedial Design	Statement of Basis	
Remedial Action – Construction	Remedial Action (including RA-Start, Operational and Functional Determination, RA– Complete, and Long-Term Response Action [if required])	Corrective Measures Implementation (including design, construction, operation, maintenance, and monitoring)	
Remedy in Place			
Remedial Action – Operation (if required)			
Last Remedy in Place	Construction Completion (all OUs/Entire Installation)		
Response Complete	Site Completion (all OUs/Entire Installation)		
	NPL Deletion		
Long-Term Monitoring (LTM)	Operation and Maintenance (including LTM)		
			Corrective Measures Completion
Site Closeout			

* States may have similar or analogous milestones or terminology.



Site Closeout Process



Site Closeout Requirements: What Remains?

“Cleanup, Cleanup, Cleanup”

- **Operation and maintenance of cleanup systems**
- **Implementing/monitoring institutional controls**
- **Findings of Suitability to Transfer (FOSTs), Deeds**
- **Community involvement**
- **Performance reviews for cleanup systems**
- **Cleanup system modifications/upgrades/security**
- **Final close out reports for installations**
- **Long-term monitoring**
- **Cleanup system/monitoring well decommissioning**
- **Deletion from National Priorities List**



Mather AFB Air Stripping Treatment Plant



BRAC Cleanup Team Workshops - Site Closeout

March AFB Groundwater Extraction Well



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Site Closeout Challenges

- **Leaving contamination in place**
- **Community concerns about process**
- **Ineffective cleanup systems**
- **Remedy in place disturbed**
- **Security/integrity of cleanup systems**
- **Effectiveness of institutional controls**
- **Future changes in land use and continued protectiveness**
- **Discovery of additional contamination**
- **Perception of leaving before the job is complete**



DoD Site Closeout Tools/Resources

- **Air Force Long-Term Monitoring Optimization Guide, Oct 97**
- **Air Combat Command Site Closure Guidance Manual, Dec 97**
- **Army Practical Guide to NPL Completion and Deletion Procedures, Dec 94**
- **Air Force No Further Response Action Planned (NFRAP) Guide, Jun 95**
- **Air Force Operating Properly and Successfully Guidance, Dec 97**
- **DoD Institutional Controls Guide, Mar 98**

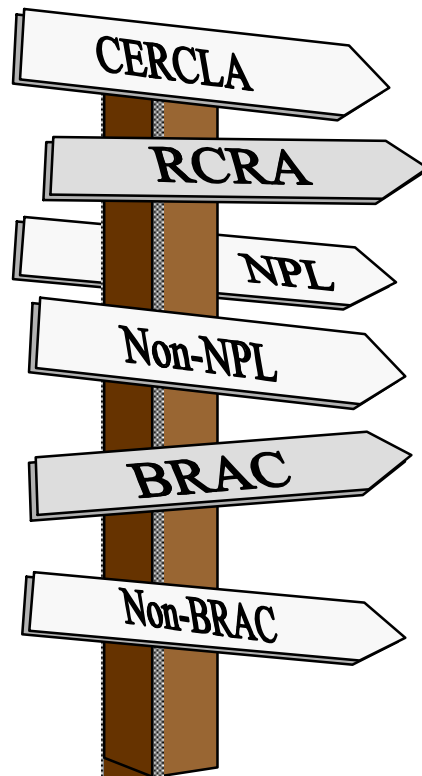


EPA Site Closeout Tools/Resources

- **Close Out Procedures for NPL Sites**
 - OSWER Directive 9320.2-09, Aug 1995
- **Structure and Components of Five-Year Reviews**
 - OSWER Directive 9355.7-02, May 1991
- **Supplemental Five-Year Review Guidance**
 - OSWER Directive 9355.7-02A, Jul 1994
- **Operating Properly and Successfully Guidance**
 - Federal Facilities Restoration and Reuse Office, Aug 1996
- **Procedures for Partial Deletions at NPL Sites**
 - OERR Directive 9320.2-11, Apr 1996



Site Closeout Working Group



- **DoD, Services, EPA, and States**
- **Working Group Internet Web Site**
 - *<http://www.afbca.hq.af.mil/closeout>*
- **Working Draft Documents**
 - *Environmental Site Closeout Process, Jan 98*
 - *Site Closeout Process Guide Introduction, May 98*
- **Interim Final Site Closeout Process Guide, Summer 98 (projected)**



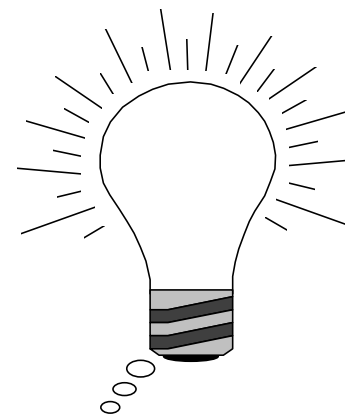
Summary

- **Cleanup requirements remain beyond LRIP/CC to achieve site closeout**
- **Partnering among stakeholders (Services, regulatory agencies, and communities) necessary to determine requirements and address challenges**
- **Adequate funding required to complete cleanup and address site closeout challenges**



Role of BCTs

- **Understand Federal and State requirements for various components of the site closeout process**
- **Ensure “Beyond LRIP/CC” requirements are fully characterized and budgeted for**
- **Consider innovative, flexible, and streamlined approaches to expedite site closeout and manage costs**



BCT Workshops - What's Available?

■ **Tomorrow - Technical Breakout Sessions**

- **Site Closeout (1:30 p.m.)**
- **RAO/LTM Optimization (3:30 p.m.)**

■ **Environmental Site Closeout Process Guide**

- ***Introduction Working Draft***

